

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Flexibility for Delivery of</b>	)	<b>IB Docket 01-185</b>
<b>Communications by</b>	)	
<b>Mobile-Satellite Service Providers</b>	)	
<b>in the 2 GHz Band, the L-Band, and</b>	)	
<b>the 1.6/2.4 GHz Bands</b>	)	

**To:   The Commission**

**MOTION FOR LEAVE TO FILE LATE REPLY TO OPPOSITION**

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully requests leave to file out of time its Reply to the March 3, 2004, Opposition of Globalstar ("Opposition") to the April 4, 2003, SBE Petition for Reconsideration of the February 10, 2003, IB Docket 01-185 Report and Order (R&O). As good cause for its request, SBE states as follows:

1. Globalstar's Opposition was served on undersigned counsel for SBE on or about March 3, 2004 by mail, and it was received by said counsel on or about March 5, 2004. However, the determination of a due date for a Reply to said Opposition (which was due on or about March 16, 2004 pursuant to Sections 1.429(g) and 1.4(h) of the Commission's Rules), was confused with that applicable in another proceeding and was miscalculated.

2. Furthermore, SBE's substantive positions are determined on a consensus basis by volunteers, and the coordination of its reply with applicable parties required until now to complete and edit.

3. It is submitted, therefore, that the delay of 14 days in submitting the contemporaneously filed Reply will not prejudice any party to this proceeding nor delay a final determination of the matter on the merits.

Therefore, the foregoing considered, the Society of Broadcast Engineers, Incorporated respectfully requests that the contemporaneously filed *Reply to Opposition to Petition for Reconsideration* be accepted and considered together with other pleadings outstanding in this proceeding.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

/s/ Ray Benedict, CSRE  
SBE President

/s/ Dane E. Ericksen, P.E., CSRTE  
Chairman, SBE FCC Liaison Committee

/s/ Christopher D. Imlay, Esq.  
General Counsel

March 30, 2004

Booth, Freret, Imlay & Tepper, P.C.  
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## **CERTIFICATE OF SERVICE**

I, Christopher D. Imlay, do hereby certify that I caused to be mailed, via first class U.S. Mail, postage prepaid, a copy of the foregoing PETITION FOR LEAVE TO FILE LATE REPLY TO OPPOSITION and a copy of the REPLY TO OPPOSITION TO PETITION FOR RECONSIDERATION to the following, this 30<sup>th</sup> day of March, 2004.

William D. Wallace, Esquire  
Crowell & Moring LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

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Christopher D. Imlay